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November 8, 2013

SENT VIA FEDERAL EXPRESS

Ms. Pamela J. Langston Scully, P.E.
Remedial Project Manager
United States Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

**RE: October 2013 Progress Report
 Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)
 Anniston, Alabama**

Dear Ms. Langston Scully:

Please find enclosed five (5) hard copies and five (5) electronic copies of the October 2013 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003 and the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of October 1, 2013 through October 31, 2013. The report also describes upcoming developments anticipated for the months of November and December 2013.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

E. Gayle Macolly
Manager, Remedial Projects
Solutia Inc.

Attachments

cc: Mr. Chip Crockett (ADEM)
 Mr. G. Douglas Jones, Esq.
 Mr. Thomas Dahl



OCTOBER 2013 PROGRESS REPORT

ANNISTON PCB SITE

(DOCKET NO. 1:02-cv-0749-KOB)

ANNISTON, ALABAMA

USEPA I.D. No. ALD 004 019 048

Submitted For:

Solutia Inc. and Pharmacia LLC

702 Clydesdale Avenue

Anniston, Alabama 36201

November 8, 2013

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION.....	1
1.1 2003 PARTIAL CONSENT DECREE.....	1
1.2 2013 OPERABLE UNIT 3 (OU-3) REMEDIAL DESIGN/REMEDIAL ACTION CONSENT DECREE.....	1
2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD	3
2.1 GENERAL 2003 CD ACTIVITIES	3
2.1.1 Administrative Submittals	3
2.2 OPERABLE UNIT 1/OPERABLE UNIT 2 (OU-1/OU-2) RESIDENTIAL PROGRAM.....	3
2.2.1 General.....	3
2.2.2 Residential Surface Sampling Program	4
2.2.2.1 Residential Sampling Access.....	4
2.2.2.2 Residential Sampling Activities	4
2.2.3 Residential Removal Properties Program	4
2.2.3.1 Residential Removal Access	4
2.2.3.2 Residential Removal Activities	5
2.3 OU-1/OU-2 NON-RESIDENTIAL PROGRAM	5
2.4 11 TH STREET DITCH	6
2.5 OPERABLE UNIT 4 (OU-4)	6
2.6 INTERIM MEASURES	6
2.7 TECHNICAL ASSISTANCE PLAN GRANT (TAPG).....	7
2.8 COMMUNITY ADVISORY GROUP (CAG).....	7
2.9 ANNISTON COMMUNITY EDUCATION FOUNDATION (ACEF).....	7
3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD	8
3.1 GENERAL OU-3 RD/RA CD ACTIVITIES	8
3.1.1 Administrative Submittals	8
3.2 REMEDIAL DESIGN	8
3.3 OPERATIONS AND MAINTENANCE	8

4.0	WORK SCHEDULED	10
4.1	2003 CD WORK ACTIVITIES	10
4.2	OU-3 RD/RA CD WORK ACTIVITIES	11

TABLES

Table 1 – Partial Consent Decree Submittal Schedule

Table 2 – OU-1 Residential Program Summary

Table 3 – Property Status for Residential Properties with Greater Than 1 ppm PCBs Results for Surface Composite Samples in Evaluation Areas 1 – 35

Table 4 – Property Status for Residential Properties with Greater than 1 ppm PCBs and Less than 400 ppm Lead Results for Surface Composite Samples in Zone A

Table 5 – Property Status for Residential Properties with Greater than 1 ppm PCBs and Less than 400 ppm Lead Results for Surface Composite Samples in Zone B

Table 6 – OU-4 Residential Program Summary

Table 7 – OU-3 Consent Decree Submittal Schedule

ATTACHMENTS

Attachment A – Autoclave Unit Project Sampling Data

1.0 INTRODUCTION

1.1 2003 Partial Consent Decree

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of October 1, 2013 through October 31, 2013, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of October 1, 2013 through

October 31, 2013, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.2 of this report describes the upcoming developments anticipated over the next two months for the work that will be required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD

2.1 General 2003 CD Activities

2.1.1 Administrative Submittals

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2) Residential Program

2.2.1 General

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

On April 26, 2011, P/S submitted the NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Revision 1.0 (Amended SSAP, Rev. 1.0), recommending no additional sampling in Zone B and responding to previous comments provided by the EPA. The EPA submitted comments to the Amended SSAP, Rev. 1.0 on May 16, 2013. P/S submitted responses to those comments to the EPA on June 28, 2013. EPA approval is pending.

On July 31, 2012, P/S submitted the NTC Removal Action Completion Report for the Residential Properties in OU-1/OU-2 (NTC Completion Report). The EPA submitted comments to the NTC Completion Report on May 16, 2013. P/S are currently preparing responses to those comments.

P/S continued to implement the approved NTC Removal Action Interim Institutional Control (IC) Program for Residential properties during this reporting period.

A summary of the residential program is presented in Table 2.

2.2.2 Residential Surface Sampling Program

2.2.2.1 Residential Sampling Access

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. There were no residential properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

2.2.2.2 Residential Sampling Activities

During this reporting period, P/S did not perform any composite surface soil sampling.

2.2.3 Residential Removal Properties Program

2.2.3.1 Residential Removal Access

Access activities include updating owner/tenant information and/or access request information and notifying the EPA of owner/tenant noncompliance with access requests. There were no residential removal properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

Currently in Evaluation Areas 1 through 35, 18 residential properties have surface composite samples with PCB results greater than or equal to 1 ppm that require a removal action. The description of each property's status is presented in Table 3.

Currently in Zone A, two residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 4.

Currently in Zone B, four residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 5.

2.2.3.2 Residential Removal Activities

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in Evaluation Areas 1 through 35 and Zones A and B.

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

P/S identified three contiguous properties located at 510 LeGrande Street, 0 Ashley Street (Tax ID 11-22-01-12-03-1-36, PPIN # 32325), and 505 Ashley Street that met the criteria for an alternative response action as defined in Section II, 7 of the Stipulation and Agreement. An Alternative Removal Action Work Plan was submitted on July 3, 2013 and is currently pending approval from the EPA.

2.3 OU-1/OU-2 Non-Residential Program

On April 23, 2013, the EPA submitted comments to the February 2013 Streamlined Ecological Risk Assessment for the OU-1/OU-2 Portion of Snow Creek (OU-1/OU-2 SERA). Consistent with the EPA approved schedule, the revised OU-1/OU-2 SERA was submitted to the EPA on June 5, 2013. The revised OU-1/OU-2 SERA is being reviewed by the EPA and will be finalized following receipt of comments.

On May 20, 2013, the EPA submitted comments to the February 2013 OU-1/OU-2 Remedial Investigation Report (OU-1/OU-2 RI Report). Consistent with the EPA approved schedule, the revised OU-1/OU-2 RI Report was submitted on June 27, 2013. The revised OU-1/OU-2 RI Report is being reviewed by EPA and will be finalized following receipt of comments.

On August 21, 2013, P/S met with the EPA and the Technical Special Master and provided an overview of the revised OU-1/OU-2 RI Report and discussed the process for preparing the OU-1/OU-2 Feasibility Study (OU-1/OU-2 FS). Final versions of the OU-1/OU-2 RI Report and the OU-1/OU-2 SERA will be provided to the EPA within thirty days of receiving formal comments.

2.4 11th Street Ditch

P/S will perform the next quarterly inspection as described in the 11th Street Ditch Operations and Maintenance Plan in the month of December 2013.

2.5 Operable Unit 4 (OU-4)

All planned data collection activities for the non-residential portions of OU-4 are complete. The receipt of the final sediment toxicity and bioaccumulation report that is being prepared by the United States Geological Survey (USGS) and the United States Army Corps of Engineers (USACE) is expected in late 2013. P/S are currently preparing the OU-4 Preliminary Site Characterization Summary Report (PSCSR) and anticipate submittal to the EPA in late 2013.

P/S have completed surface sampling at all residential properties identified in the EPA-approved OU-4 Residential Property Field Sampling Plan (OU-4 RPFSP) and have provided sample results to the EPA. Eleven residential removal actions within OU-4 have been completed, with one property remaining that requires a residential removal action that has not been completed due to access issues. A summary of the OU-4 residential program is presented in Table 6.

2.6 Interim Measures

P/S continue to support activities for the Alabama Department of Transportation (ALDOT) Interstate 20 (I-20) Bridge Expansion Project over Snow Creek. This work, which includes excavation and capping of areas affected by ALDOT's proposed bridge replacement and widening of I-20 over Snow Creek, began in early November 2010 and was substantially completed in April 2013. Right-of-way fencing remains to be installed and is expected to be completed in late 2013.

On September 18, 2013, P/S completed the support work for the redevelopment of the former Holiday Inn property located at 601 Hamric Drive in Oxford, Alabama with the oversight of the EPA. P/S are currently preparing a Completion Report for submittal to the EPA.

On September 12, 2013, P/S submitted the Colonial Pipeline Recoating Project Support Work Plan to the EPA to provide support to Colonial Pipeline and its contractor to address PCB impacted soils within the proposed footprint of the planned recoating work in three areas of the

Choccolocco Creek floodplain. The Colonial Pipeline Recoating Project Support Work Plan was approved by the EPA on September 24, 2013. Work on this project is anticipated in late 2013.

On September 12, 2013, P/S submitted a proposed sampling plan for the Anniston Regional Airport Fence Installation Project. The EPA approved the sampling plan on September 19, 2013 with two conditions: 1) that ten additional surface samples (0-6 inches) be collected at the channel crossing fence post locations, distributed among the four channel crossings; and 2) that ten percent of the field screened samples be submitted for confirmatory laboratory analysis. Sampling was completed the week of October 7, 2013. P/S are currently preparing a support work plan for this project for submittal to the EPA.

2.7 Technical Assistance Plan Grant (TAPG)

The Technical Advisor (TA), Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the Community Advisory Group (CAG) and the community. Mr. Thomas' reports are posted on the West Anniston Foundation's web site.

On October 22, 2013, the West Anniston Foundation held a community education forum on the PCB clean-up for the Anniston PCB Site. The Special Master for the Court and the Technical Special Master were present to participate in the discussion.

2.8 Community Advisory Group (CAG)

There was no CAG meeting scheduled for October. The next CAG meeting is scheduled for November 18, 2013.

2.9 Anniston Community Education Foundation (ACEF)

The ACEF continues to collaborate with community leaders, parents, educational foundations, religious entities, public schools and other civic organizations to assist in the process of improving the quality of education for children in the community.

3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD

3.1 General OU-3 RD/RA CD Activities

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 7.

3.1.1 Administrative Submittals

On August 28, 2013, P/S submitted a revised draft deed notice along with Revision 1 of the OU-3 Remedial Design Work Plan (RD Work Plan). The revised deed notice included in the RD Work Plan excluded a 0.209 acre commercial parcel located northeast of OU-3. EPA approval is pending.

3.2 Remedial Design

P/S submitted the OU-3 RD Work Plan and the OU-3 RD Health and Safety Plan (HASP) to the EPA on April 30, 2013. In accordance with the requirements of the OU-3 RD/RA CD, the RD Work Plan includes the OU-3 Sampling and Analysis/Quality Assurance Project Plan (SA/QAPP), and a draft Institutional Control Implementation and Assurance Plan (ICIAP). The EPA provided comments to the RD Work Plan, the SA/QAPP and the ICIAP on July 29, 2013. On August 28, 2013, P/S submitted responses to the EPA's comments along with Revision 1 of the RD Work Plan, the SA/QAPP and the Draft ICIAP. The EPA provided comments to Revision 1 of the RD Work Plan and the Draft ICIAP on October 31, 2013. P/S are currently preparing a response to those comments.

3.3 Operations and Maintenance

Solutia recently commenced construction of a new Autoclave Unit within OU-3. Prior to constructing the foundation, subsurface soil was removed from approximately one to three feet below ground surface (bgs) and partially replaced with compacted fill material. The excavated soil was stockpiled and sampled prior to being transported off site for disposal. Two five-point composite samples were collected from the stockpiled soil, field screened for PCBs for waste characterization and submitted for laboratory analysis to fulfill an ADEM requirement for waste profile renewal through Waste Management. The results for the samples collected are included in Attachment A. Based on the results of this analysis, P/S prepared a Work Plan for Delineation of

Soil Containing Elevated Levels of PCBs in the area of the Autoclave Unit and submitted it to the EPA on October 25, 2013 for approval. EPA approval is currently pending. A remedial action work plan will be prepared once the extent of the soil containing elevated levels of PCBs is determined.

4.0 WORK SCHEDULED

4.1 2003 CD Work Activities

During the months of November and December 2013, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform removal actions for residential properties in OU-1/OU-2 and OU-4 as access is provided (as necessary);
- Address action items identified by P/S, the EPA and/or the property owner/tenant for completed removal response properties (as necessary);
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11th Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Prepare and submit the OU-4 Preliminary Site Characterization Summary Report;
- Continue to implement I-20 Snow Creek Bridge Expansion Project Support Work Plan;
- Prepare and submit a Completion Report for the work completed for the Former Holiday Inn Redevelopment Project;
- Provide construction support to Colonial Pipeline for the pipeline recoating project;
- Prepare and submit a Support Work Plan for the Anniston Regional Airport Fence Installation Project;
- Respond to EPA comments, as necessary, on deliverables submitted to the EPA for approval;
- The CAG will hold a regularly scheduled meeting on November 18, 2013; and
- ACEF will continue to hold board meetings.

4.2 OU-3 RD/RA CD Work Activities

During the months of November and December 2013, the following work elements are anticipated:

- Record the updated deed notice for OU-3, and provide EPA with a certified copy of the recorded notice within ten days of recording;
- Respond to EPA's comments received on October 31, 2013 on the OU-3 RD Work Plan and the OU-3 ICIAP;
- Plan and conduct the Pre-Design Investigation per the approved OU-3 RD Work Plan and OU-3 SA/QAPP;
- Commence work on the 30% Design for the OU-3 RD; and
- Conduct the autoclave delineation sampling.

TABLES

TABLE 1
PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Reports

Central Staging and Soil Management Area (Former Miller Property) Final Closure Report ⁽¹⁾	Submitted to EPA Approval Pending	July 11, 2006
Temporary Staging and Loading Area Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	January 11, 2007
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA Approval Pending	May 2, 2012
NTC Removal Action Completion Report for Residential Properties in OU-1/OU-2	Submitted to EPA Comments Received	July 31, 2012 May 16, 2013
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA Approval Pending	June 30, 2010
Streamlined Ecological Risk Assessment for the OU-1/OU-2 Portion of Snow Creek	Submitted to EPA Comments Received Revision Submitted Approval Pending	February 12, 2013 April 23, 2013 June 5, 2013
Remedial Investigation Report for OU-1/OU-2	Submitted to EPA Comments Received Revision Submitted Approval Pending	February 18, 2013 May 20, 2013 June 27, 2013
Technical Memorandum OU-1/OU-2 Data Gaps (Temporary Well T-11)	Submitted to EPA Approval Pending	February 18, 2013
September 2013 Progress Report	Submitted to EPA	October 9, 2013

Work Plans

NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Rev. 1	Submitted to EPA Comments Received Response Submitted Approval Pending	April 26, 2011 May 16, 2013 June 28, 2013
Alternative Removal Action Workplan For the 510 LeGrande Street and 0 and 505 Ashley Street Properties	Submitted to EPA Approval Pending	July 3, 2013

Notes:

⁽¹⁾ The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-1/OU-2.

TABLE 2

OU-1 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

Residential Surface Sampling Program (Evaluation Areas 1-35) ⁽¹⁾		October 2013
No. of properties where access has been requested to surface sample		0
No. of properties where total access has been granted to surface sample		0
No. of properties surface sampled		0
No. of properties where validated analytical results were received		0
No. of properties with validated PCB surface results \geq 1 ppm		0
Total no. of properties with PCB surface results \geq 1 ppm ⁽²⁾⁽³⁾⁽⁷⁾		18
Total no. of properties with PCB surface results < 1 ppm ⁽⁴⁾		1232
Residential Removal Action Program (Evaluation Areas 1-35) ⁽¹⁾		October 2013
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
Total no. of removal action properties Unsuitable for Removal ⁽⁷⁾		23
Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)		11
Total no. of removal action properties completed by Solutia (as part of AOC and CD) ⁽³⁾⁽⁴⁾⁽⁵⁾		366
Total no. of > 1 ppm PCBs removal action properties completed by EPA (confirmed) ⁽⁶⁾		8
Residential Surface Sampling Program (Special Use Properties - Evaluation Areas 1-35)		October 2013
No. of properties where access has been requested to surface sample		0
No. of properties where total access has been granted to surface sample		0
No. of properties surface sampled		0
No. of properties where validated analytical results were received		0
No. of properties with validated PCB surface results \geq 1 ppm in High Activity Areas		0
Total no. of properties with PCB surface results \geq 1 ppm in High Activity Areas		0
Total no. of properties with PCB surface results < 1 ppm in High Activity Areas		24
Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)		October 2013
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties where depth, and/or confirmatory samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)		9

TABLE 2

OU-1 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

Residential Removal Action Program (Lead Site AOC Zone A)	October 2013
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	440
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	2
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	78
Total no. of removal action properties Unsuitable for Removal	3
<hr/>	
Residential Removal Action Program (Lead Site AOC Zone B)	October 2013
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	525
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm ⁽⁸⁾	4
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	113
Total no. of removal action properties Unsuitable for Removal ⁽⁸⁾	5

Notes:

⁽¹⁾ Evaluation Areas 1 through 34 also represents the Lead Site AOC Zones C and D.

⁽²⁾ Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

⁽³⁾ This total includes three properties where removals have previously been completed, but additional removals are required in the footprint of former structures.

⁽⁴⁾ This total has been updated to reflect the property at 601 Zinn Parkway (Parcel 2853) that was inadvertently removed with the adjacent property.

⁽⁵⁾ This total includes 3 Appendix 6 properties within Evaluations Areas 1-35 where removals were completed by Solutia.

⁽⁶⁾ This total has been updated to include a property where a removal action was completed by the EPA that contains > 1 ppm PCBs by grab sampling.

⁽⁷⁾ A portion of Calhoun Street (11-22-01-12-03-1-12; Parcel 3127) is suitable for removal.

⁽⁸⁾ 3824 George Street (Parcel 201527) is suitable for removal.

TABLE 3

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS FOR SURFACE COMPOSITE
SAMPLES IN EVALUATION AREAS 1-35
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	EVALUATION AREA	GIS PARCEL ID	PROPERTY STATUS
Residential Program			
1010 Pipe Street	16	1853	Non-Responsive
807 Bancroft Avenue	34	2443	Non-Responsive
918 McDaniel Avenue	11	2217	Non-Responsive
703 Pine Street ⁽²⁾	3	2664	Non-Responsive
510 Legrande Street	13	3070	On Hold
Ashley Street (11-22-01-12-03-1-36)	13	3109	On Hold
631 Roxie Avenue	9	7717	Owner Declined Access During Removal Initiation
916 McDaniel Avenue	11	2254	Owner Declined Access During Removal Initiation
1627 W. 13th Street	21	1061	Owner Declined Removal Access
2106 W. 10th Street	15	2128	Owner Declined Removal Access
1204 Ferron Street	18	1372	Owner Not Found
402 Hunter Street	31	3542	Owner Not Found
509 W. 13th Street	24	1136	Owner Not Found
716 Montrose Avenue ⁽²⁾	11	2500	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) ⁽¹⁾	21	973	Owner Not Found
621 Pine Street ⁽²⁾	3	2820	Owner Not Found
822 (&824) Crawford Avenue ⁽¹⁾	34	2506	Removal Access Granted, Depth Sampling Pending
Calhoun Street (11-22-01-12-03-1-12) ⁽¹⁾	13	3127	Removal Access In Progress

Notes:

⁽¹⁾ Portions of property are no longer unsuitable for removal⁽²⁾ Property requires additional removal at the site of the former structure

TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS
FOR SURFACE COMPOSITE SAMPLES IN ZONE A
ANNISTON PCB SITE
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
124 W. 18th Street	207123	Owner Declined Access During Removal Initiation	EPA
0 Golden Springs Road	533058	Owner Declined Removal Access	Foothills Community Partnership

TABLE 5

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS
FOR SURFACE COMPOSITE SAMPLES IN ZONE B
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
318 Glen Addie Avenue	3567	Non-Responsive	Foothills Community Partnership
2705 Wilmer Avenue	204090	Non-Responsive	Foothills Community Partnership
3002 Jefferson Street	3410	Owner Declined Removal Access	Foothills Community Partnership
3824 George Street	201527	Removal Access In Progress	Foothills Community Partnership

TABLE 6

OU-4 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

OU-4 Residential Surface Sampling Program	October 2013
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	0
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results ≥ 1 ppm	0
Total no. of properties with PCB surface results ≥ 1 ppm ⁽¹⁾	1
Total no. of properties with PCB surface results < 1 ppm	22
OU-4 Residential Removal Action Program	October 2013
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of removal action properties completed by Solutia	11

Notes:

⁽¹⁾ The owner at 0 Howard Drive (07-06-14-0-000-004.00) - Parcel ID 600117 denied access for P/S to complete a removal action at this property.

TABLE 7
OU-3 CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Draft deed notice to be filed with Calhoun County land records with an updated description of Operable Unit 3 ⁽¹⁾	Submitted to EPA	April 30, 2013
	Revision Submitted	August 28, 2103
	Approval Pending	

Work Plans

Operable Unit 3 Remedial Design Work Plan	Submitted to EPA	April 30, 2013
	Comments Received	July 29, 2013
	Revision Submitted	August 28, 2103
	Comments Received	October 31, 2013
RD Sampling and Analysis / Quality Assurance Project Plan (SA/QAPP) ⁽²⁾	Submitted to EPA	April 30, 2013
	Comments Received	July 29, 2013
	Revision Submitted	August 28, 2103
	Approval Pending	
Draft Institutional Control Implementation and Assurance Plan (ICIAP) ⁽²⁾	Submitted to EPA	April 30, 2013
	Comments Received	July 29, 2013
	Revision Submitted	August 28, 2103
	Comments Received	October 31, 2013
OU-3 RD Health and Safety Plan (HASP)	Submitted to EPA	April 30, 2013
Work Plan for Delineation of Soil Containing Elevated Levels of PCBs, Autoclave Unit Project	Submitted to EPA	October 25, 2013
	Approval Pending	

Notes:

⁽¹⁾ The draft deed notice was submitted with the OU-3 Draft ICIAP, included in the Remedial Design Work Plan

⁽²⁾ Submitted as an Appendix of the OU-3 Remedial Design Work Plan.

ATTACHMENTS

ATTACHMENT A

AUTOCLAVE UNIT PROJECT SAMPLING DATA ANNISTON PCB SITE *Anniston, Alabama*

Field Sample ID	Sample Date	Matrix	Sample Type	Total PCB Screening (Immunoassay) (ppm)	Total PCBs (mg/kg)	Aroclor 1016 (mg/kg)	Aroclor 1221 (mg/kg)	Aroclor 1232 (mg/kg)	Aroclor 1242 (mg/kg)	Aroclor 1248 (mg/kg)	Aroclor 1254 (mg/kg)	Aroclor 1260 (mg/kg)	Aroclor 1268 (mg/kg)
SP-081313-1	8/13/13	Soil	Composite	>50	596	ND	100	ND	ND	130 J	150	130	86
SP-081313-2	8/13/13	Soil	Composite	>50	1000	ND	180	ND	ND	230 J	240	200	150

Notes

ppm - parts per million

mg/kg - milligrams per kilogram

ND - Non-detect

J - Estimated value

PCB - polychlorinated biphenyl

Total PCB concentrations are determined by USEPA Method 8082.

Total PCB Screening (Immunoassay) concentrations are determined by USEPA Method 4020 (Immunoassay Field Screening Test Methods).